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Timothy S. McFadden (TSM 9650) (*pro hac vice* application pending)

-and-

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Attorneys for Methode Electronics, Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: Chapter 11 Case No.  
DELPHI CORP, et al. 05-44481 (RDD)  
Debtors. (Jointly Administered)

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**NOTICE OF MOTION OF METHODE ELECTRONICS, INC. FOR RELIEF FROM  
THE AUTOMATIC STAY TO PERMIT IT TO EXERCISE  
SETOFF AND/OR RECOUPMENT RIGHTS**

**PLEASE TAKE NOTICE**, that on August 14, 2006, Methode Electronics, Inc. (“Methode”) filed a Motion for Relief from the Automatic Stay to Permit It to Exercise Setoff and/or Recoupment Rights (the “Motion”).

**PLEASE TAKE FURTHER NOTICE**, that a hearing to consider approval of the Motion will be held on September 14, 2006 at 10:00 a.m., before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York, 10004.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall state the name of the objectant, the basis of the objection and state with particularity the grounds therefor and shall be filed with the Bankruptcy Court electronically as follows: (a)(1) through the Bankruptcy Court's electronic filing system (in accordance with Order M-242), which may be accessed through the Internet at the Bankruptcy Court's website: [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), using Netscape Navigator software version 3.0 or higher and (ii) in portable document format (PDF) using Adobe Exchange software for conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number to which the objection refers and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party shall submit the response or objection on a diskette in either Word, WordPerfect, or DOS text (ASCII) format. A response or objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph. Responses or objections shall be filed, and a hard copy of the objection, whether filed pursuant to a section (a), (b) or (c) as set forth in this paragraph, shall also be delivered to the Chambers of the Honorable Robert D. Drain and served on the undersigned counsel, at the address set forth below, so as to be received no later than 2 p.m. on September 7, 2006, as per the Case Management Order.

**PLEASE TAKE FURTHER NOTICE** that only those objections made as set forth herein and in accordance with all applicable case management orders will be considered by this Court at the Hearing. If no objections to the Motion are timely filed and served in accordance

with the procedures set forth herein and in any applicable case management orders, the Court may enter an order granting the Motion without further notice.

Dated: August 14, 2006

Respectfully submitted,

/s/ Timothy S. McFadden  
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